

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AVERY WADE SCHOENBORN,

Defendant.

) **INDICTMENT**
)
) 18 U.S.C. § 1151
) 18 U.S.C. § 1153(a)
) 18 U.S.C. § 2242(2)(B)
) 18 U.S.C. § 2246(2)(A)
)
)
)

CR 13-149 RHK/LIB

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Sexual Abuse)

On or about May 7, 2013, in the State and District of Minnesota and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

AVERY WADE SCHOENBORN,

an Indian, did engage in a sexual act to wit, sexual intercourse, with Jane Doe, a known adult female and also an Indian, and who was physically incapable of declining participation in, and communicating unwillingness to engage in, that sexual act, in violation of Title 18, United States Code, Sections 2242(2)(B), 2246(2)(A), 1151 and 1153(a).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON



FILED JUN 10 2013
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTERED _____
DEPUTY CLERK'S INITIALS _____